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6 *Attorney for Defendant*
THUNDER PROPERTIES, INC.
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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 ***

13 U.S. Bank National Association, As Trustee)
for JP Morgan Mortgage Acquisition Trust)
14 2006-RM1, Asset Backed Pass-Through)
Certificates, Series 2006-RM1, a national)
15 bank,)
16 Plaintiff,)
17 vs.)
18 RENOVISTA RIDGE MASTER PROPERTY)
OWNERS' ASSOCIATION, a Nevada)
19 nonprofit corporation; NEVADA)
ASSOCIATION SERVICES, INC., a Nevada)
20 corporation; THUNDER PROPERTIES, INC.,)
a Nevada corporation; VEISINIA TUAVAO, an)
21 individual; FILIMONE TUAVAO, an)
individual; DOES 1 through 10, inclusive, and)
22 ROES 1 through 10, inclusive.)
23 Defendants.)
_____)

Case No. 3:17-cv-000283-RCJ-VPC

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25 **STIPULATION AND ORDER TO EXTEND TIME TO**
RESPOND TO MOTION FOR SUMMARY JUDGMENT
26 **(First Request)**

27 COMES NOW, Defendant, THUNDER PROPERTIES, INC., and Plaintiff, U.S. BANK
28 NATIONAL ASSOCIATION, AS TRUSTEE, by and through their undersigned counsel, and

hereby stipulate and agree as follows:

1. On March 12, 2018, Plaintiff filed a Motion for Summary Judgment herein [ECF #33]. A Responses was due on April 2, 2018. A hearing related to said Motion is presently scheduled to take place on June 12, 2018. [ECF #35].
2. Defendant's counsel has been required to devote time and attention to numerous other pending legal matters since the filing of the Motion for Summary Judgment which have detracted from the time available prepare a response.
3. Moreover, Defendant's counsel would like the opportunity to engage in meaningful settlement discussions prior to investing further time and expense in litigation.
4. The failure the request an extension prior to the due date was the result of unintended oversight. Defendant's counsel respectfully submits that the failure to timely request an extension in advance of the due date constitutes excusable neglect.
5. Based upon the foregoing, Defendant has requested and shall be granted an extension of time until May 2, 2018, in which to respond to the Plaintiff's Motion for Summary Judgment.
6. Plaintiff shall have an extension of time until May 30, 2018, in which to file any Reply.

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7. The proposed extensions will not interfere with the hearing that is scheduled to take place on June 12, 2018.

8. This Stipulation is made in good faith and not for purpose of delay.

Dated this 4th day of April, 2018.

ROGER P. CROTEAU &
ASSOCIATES, LTD.

ZIEVE, BRODNAX & STEELE, LLP

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U.S. Bank National Association, As Trustee*

IT IS SO ORDERED.

By: 

Judge, U.S. District Court

Dated: April 24, 2018.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of April, 2018, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT (First Request)** to the following parties:

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